

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>JOSEPH MO PUN LAU</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy - 1 count);</b>
	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud - 1 count);</b>
	<b>:</b>	<b>18 U.S.C. § 1704 (possession of counterfeit</b>
	<b>:</b>	<b>U.S. Mail keys with intent to use</b>
	<b>:</b>	<b>unlawfully - 1 count);</b>
	<b>:</b>	<b>18 U.S.C. § 1708 (theft of mail matter - 1</b>
		<b>count)</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

**The Financial Institutions**

1. Wachovia Bank was a financial institution, conducting business in the State of Delaware, the Commonwealth of Virginia and the Commonwealth of Pennsylvania, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. Commerce Bank was a financial institution, conducting business in the State of Delaware, the State of New Jersey and the Commonwealth of Pennsylvania, the deposits of which were insured by the Federal Deposit Insurance Corporation.

3. PNC Bank was a financial institution, conducting business in the State of Delaware and the Commonwealth of Pennsylvania, the deposits of which were insured by the Federal Deposit Insurance Corporation.

4. Bank of America was a financial institution, conducting business in the State of Maryland, the Commonwealth of Virginia and the Commonwealth of Pennsylvania, the deposits of which were insured by the Federal Deposit Insurance Corporation.

5. Suntrust Bank was a financial institution, conducting business in the State of Maryland, the Commonwealth of Virginia and the Commonwealth of Pennsylvania, the deposits of which were insured by the Federal Deposit Insurance Corporation.

United States Postal Service Mail Collection Boxes and Arrow Keys

6. The United States Postal Service (“USPS”) uses mail collection boxes for purposes of collecting and distributing mail to customers of USPS. Only authorized USPS employees are entitled to have access to mail which has been deposited into the mail collection boxes for purposes of delivery by USPS employees to USPS customers. The mail collection boxes are accessible by a key known as an “arrow key,” and there is only one USPS arrow key per mail route which opens all mail collection boxes located on the route. At the conclusion of each business day, the USPS employee assigned to collect and deliver mail along the mail route is required to turn in the USPS arrow key in order to prevent unauthorized access to the mail collection boxes.

7. From in or about March 2003 to in or about August 2005, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JOSEPH LAU**

conspired and agreed with other persons known to the United States Attorney to defraud Wachovia Bank, Commerce Bank, PNC Bank, Bank of America and Suntrust Bank, by depositing stolen and counterfeited checks into bank accounts that had been opened using false

identification documents and then withdrawing the deposited funds, in violation of Title 18, United States Code, Section 1344.

8. As a result of this conspiracy and fraudulent scheme, more than \$400,000 worth of counterfeit checks were deposited into bank accounts at Wachovia Bank, Commerce Bank, PNC Bank, Bank of America and Suntrust Bank, and the funds subsequently withdrawn from the bank accounts at various banking locations in Pennsylvania and elsewhere.

#### **MANNER AND MEANS**

It was part of the conspiracy that:

9. Defendant JOSEPH MO PUN LAU and another person known to the United States Attorney would use a wooden block covered with adhesive material and connected to a wire for purposes of retrieving mail, known as “fishing” for mail, that had been deposited into USPS mail collection boxes in the Eastern District of Pennsylvania and elsewhere for collection and delivery by USPS employees.

10. Defendant JOSEPH MO PUN LAU and another person known to the United States Attorney would secretly video tape USPS employees using USPS arrow keys to open USPS mail collection boxes located in the Eastern District of Pennsylvania. After videotaping the USPS employees, defendant JOSEPH LAU would then create enlarged still images from the video footage from which he would then create templates from which counterfeit USPS arrow keys could be cut for purposes of gaining unlawful access to the USPS mail collection boxes. Once the template was created, defendant JOSEPH LAU would then use key cutting equipment to create counterfeit USPS arrow keys.

11. Using the counterfeit USPS arrow keys and the “fishing” system described above, defendant JOSEPH MO PUN LAU and other persons known to the United States Attorney would steal valid checks from USPS mail collection boxes located in the Eastern District of Pennsylvania and elsewhere, between March 2003 and August 2005. The stolen checks would then be used by defendant JOSEPH MO PUN LAU to create counterfeit checks made payable to various aliases assumed by defendant JOSEPH MO PUN LAU and other persons known to the United States Attorney, including but not limited to, “Dian Liu,” “Kong Ni,” “Bo Liang Li,” “Huan Chen,” “Ying Pan,” “Chao Hui Jiang,” “Van Thu Banh,” “Xiong Zheng,” “Yuk Tung Chan,” and “Zhi Lin.”

12. Defendant JOSEPH MO PUN LAU would create false identification documents for the various aliases assumed by defendant JOSEPH MO PUN LAU and other persons known to the United States Attorney, including but not limited to “Dian Liu,” “Kong Ni,” “Bo Liang Li,” “Huan Chen,” “Ying Pan,” “Chao Hui Jiang,” “Van Thu Banh,” “Xiong Zheng,” “Yuk Tung Chan,” and “Zhi Lin.” The false identification documents would be used by defendant LAU and other persons known to the United States Attorney to open bank accounts in the State of Delaware, the State of Maryland, the Commonwealth of Virginia and the Commonwealth of Pennsylvania.

13. After stealing legitimate checks from the mail and counterfeiting the checks, defendant JOSEPH MO PUN LAU would meet with persons known to the United States Attorney at Philadelphia, Pennsylvania, where he would provide persons known to the United States Attorney with the counterfeit checks. The counterfeit checks would then be deposited into the bank accounts which had been opened with false identification documents.

14. After the counterfeit and worthless checks were deposited into the bank accounts opened with false identification, thereby causing the bank accounts to show false and inflated balances, defendant JOSEPH MO PUN LAU and other persons known to the United States Attorney would withdraw the deposited monies using the following methods:

- a. cash withdraws at the time of the initial deposit of a counterfeit check;
- b. the purchase of United States Postal Service money orders;
- c. Automatic Teller Machine (ATM) withdraws;
- d. debit card purchases; and
- e. the payment of credit card accounts using checks received when the bank accounts were opened using the false identification documents.

The stolen proceeds would then be shared among defendant JOSEPH MO PUN LAU and the other persons known to the United States Attorney.

### **OVERT ACTS**

In furtherance of the conspiracy and to effect the object of the conspiracy, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

#### **The Wachovia Bank Fraud Scheme**

15. In or about February 2003, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open Wachovia Bank checking account no. XXXXXXXXXX7031, in the name of "Dian Liu."

16. In or about February 2003, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open Wachovia Bank checking account no. XXXXXXXXXX4737, in the name of “Kong Ni.”

17. In or about March 2003, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open Wachovia Bank checking account no. XXXXXXXXXX4858, in the name of “Bo Liang Li.”

18. In or about October 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open Wachovia Bank checking account no. XXXXXXXXXX8636 and Wachovia Bank savings account no. XXXXXXXXXX5864, in the name of “Huan Chen.”

19. In or about October 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open Wachovia Bank checking account no. XXXXXXXXXX2770 and Wachovia Bank savings account no. XXXXXXXXXX4454, in the name of “Ying Pan.”

20. In or about November 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open Wachovia Bank checking account no. XXXXXXXXXX1734 and Wachovia Bank savings account no. XXXXXXXXXX4608, in the name of “Chao Hui Jiang.”

21. In or about November 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created

by JOSEPH MO PUN LAU to open Wachovia Bank checking account no. XXXXXXXXXX1326 and Wachovia Bank savings account no. XXXXXXXXXX9438, in the name of “Van Thu Banh.”

22. Between on or about May 1, 2003 and May 2, 2003, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 2 stolen and counterfeit checks, totaling \$7,059.30, into Wachovia Bank checking account no. XXXXXXXXXX7031.

23. Between on or about July 3, 2003 and September 8, 2003, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 42 stolen and counterfeit checks, totaling \$83,159.44, into Wachovia Bank checking account no. XXXXXXXXXX4737.

24. Between on or about April 7, 2004 and April 9, 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 3 stolen and counterfeit checks, totaling \$11,780, into Wachovia Bank checking account no. XXXXXXXXXX4858.

25. Between on or about February 1, 2005 and February 3, 2005, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 13 stolen and counterfeit checks, totaling \$13,138.81, into Wachovia Bank checking account no. XXXXXXXXXX1326 and Wachovia Bank savings account no. XXXXXXXXXX9438, and then withdrew and attempted to withdraw the deposited funds at various banking locations in Pennsylvania and Delaware. and New Jersey.

26. Between on or about February 2, 2005 and February 7, 2005, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited

approximately 6 stolen and counterfeit checks, totaling \$9,803.03, into Wachovia Bank checking account no. XXXXXXXXXX1734 and Wachovia Bank savings account no. XXXXXXXXXX4608, and then withdrew and attempted to withdraw the deposited funds at various banking locations in Pennsylvania and Delaware.

27. Between on or about March 21, 2005 and in or about May 2005, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 13 stolen and counterfeit checks, totaling approximately \$28,943.23, into Wachovia Bank checking account no. XXXXXXXXXX8636 and Wachovia Bank savings account no. XXXXXXXXXX5864, and then withdrew and attempted to withdraw the deposited funds from Wachovia Bank checking account no. XXXXXXXXXX8636 and Wachovia Bank savings account no. XXXXXXXXXX5864, at various banking locations in Pennsylvania, Delaware, New Jersey and New York.

28. On or about March 21, 2005, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited 2 stolen and counterfeit checks, totaling approximately \$4,741.50, into Wachovia Bank checking account no. XXXXXXXXXX2770 and Wachovia Bank savings account no. XXXXXXXXXX4454.

#### **The Commerce Bank Fraud Scheme**

29. On or about October 12, 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open Commerce Bank checking account no. XXXXXX6715 and Commerce Bank savings account no. XXXXXX2687, in the name of “Ying Pan.”



30. On or about October 18, 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open Commerce Bank checking account no. XXXXX8085 and Commerce Bank savings account no. XXXXX6371, in the name of Huan Chen.

31. On or about March 23, 2005, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited a stolen and counterfeit check, totaling approximately \$20,000, into Commerce Bank checking account no. XXXXX8085.

32. Between on or about March 28, 2005 and April 8, 2005, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 25 stolen and counterfeit checks, totaling approximately \$48,301.97, into Commerce Bank checking account no. XXXXX7175 and Commerce Bank savings account no. XXXXX2687, and then withdrew the deposited funds from Commerce Bank at various banking locations in Pennsylvania, Delaware, New Jersey and New York.

#### **The PNC Bank Fraud Scheme**

33. In or about November 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open PNC Bank checking account no. XXXXXX0494 and PNC Bank savings account no. XXXXXX7594, in the name of “Van Thu Banh.”

34. In or about November 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open PNC Bank checking account no. XXXXXX0567 and PNC Bank savings account no. XXXXXX2028, in the name of “Chao Hui Jiang.”

35. In or about November 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open PNC Bank checking account no. XXXXXX6146, in the name of “Xiong Zheng.”

36. Between on or about February 2, 2005 and February 9, 2005, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 6 stolen and counterfeit checks, totaling approximately \$17,580.24, into PNC Bank checking account no. XXXXX0567 and PNC Bank savings account no. XXXXX2028.

37. Between on or about February 16, 2005 and February 28, 2005, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 11 stolen and counterfeit checks, totaling approximately \$23,344.68, into PNC Bank checking account no. XXXXX6146, and then withdrew the deposited funds from PNC Bank at various banking locations in Pennsylvania, Delaware, New Jersey and New York..

38. Between on or about February 22, 2005 and March 1, 2005, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 18 stolen and counterfeit checks, totaling approximately \$35,254.03, into PNC Bank checking account no. XXXXX0494 and PNC Bank savings account no. XXXXX7594, and then withdrew the deposited funds from PNC Bank at various banking locations in Pennsylvania and Delaware.

#### **The Bank of America Fraud Scheme**

39. In or about March 2003, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by

JOSEPH MO PUN LAU to open Bank of America checking account no. XXXXXX7969, in the name of “Zhi Lin.”

40. In or about March 2003, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open Bank of America checking account no. XXXXXX0272 and Bank of America savings account no. XXXXXX4864, in the name of “Yuk Tung Chan.”

41. In or about April 2003, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open Bank of America checking account no. XXXXXX5107 and Bank of America savings account no. XXXXXX4674, in the name of “Bo Liang Li.”

42. Between on or about May 29, 2004 and July 8, 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 33 stolen and counterfeit checks, totaling approximately \$41,265.68 into Bank of America checking account no. XXXXXX0272 and Bank of America savings account no. XXXXXX4864, and then withdrew the funds from Bank of America at various banking locations in Pennsylvania and Maryland.

43. Between on or about June 30, 2004 and July 8, 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 11 stolen and counterfeit checks, totaling approximately \$20,448.76 into Bank of America checking account no. XXXXXX5107 and Bank of America savings account no. XXXXXX4674, and then withdrew the funds from Bank of America at various banking locations in Pennsylvania and Maryland.

44. Between on or about August 13, 2004 and August 26, 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 22 stolen and counterfeit checks, totaling approximately \$48,439.92 into Bank of America checking account no. XXXXXX7969, and then withdrew the funds from Bank of America at various banking locations in Pennsylvania and Maryland.

**The Suntrust Bank Fraud Scheme**

45. In or about March 2003, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney used false identification documents created by JOSEPH MO PUN LAU to open Suntrust Bank checking account no. XXX1654, in the name of “Yuk Tung Chan.”

46. Between on or about April 16, 2004 and April 22, 2004, defendant JOSEPH MO PUN LAU and another person known to the United States Attorney deposited approximately 3 stolen and counterfeit checks, totaling approximately \$14,751.75 into Suntrust Bank checking account no. XXX1654, and then withdrew the funds from Bank of America at various banking locations in Pennsylvania and Maryland.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 6 and paragraphs 8 through 46 of Count One of this Information are incorporated here.

2. From in or about March 2003, to in or about August 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

JOSEPH MO PUN LAU

knowingly executed and attempted to execute a scheme to defraud Wachovia Bank, Commerce Bank, PNC Bank, Bank of America and Suntrust Bank, and to obtain moneys, funds, credits, assets, securities and other property owned by or under the control custody of Wachovia Bank, Commerce Bank, PNC Bank, Bank of America and Suntrust Bank, by means of materially false and fraudulent pretenses, representations and promises.

In violation of Title 18, United States Code, Section 1344.

**COUNT THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 6 and 8 through 14 of Count One of this Information are incorporated here.

2. At all times material to this information, United States Postal Service arrow keys were keys suited to locks adopted by the United States Postal Service and in use on authorized receptacles for the deposit or delivery of mail matter, including but not limited to, United States Postal Service blue collection boxes.

3. On or about August 16, 2005, in the Eastern District of Pennsylvania, defendant

JOSEPH MO PUN LAU

knowingly and unlawfully possessed 23 counterfeit United States Postal Service arrow keys, with the intent to unlawfully and improperly use the keys.

In violation of Title 18, United States Code, Section 1704.

**COUNT FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 6 and 8 through 14 of Count One of this Information are incorporated here.

2. From in or about March 2003 to in or about August 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

**JOSEPH MO PUN LAU**

knowingly stole, took, and abstracted United States mail from a mail route and other authorized depository for mail matter, that is, defendant stole numerous personal and business checks, valued at approximately \$477,997.75, from United States Postal Service mail collection boxes in which the personal and business checks had been deposited for purposes of collection and delivery by the United States Postal Service.

In violation of Title 18, United States Code, Section 1708.

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**PATRICK L. MEEHAN**  
**UNITED STATES ATTORNEY**